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UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE

ALTA MESA  
RESOURCES, INC.  
SECURITIES  
LITIGATION

Civil Action No. 4:19-cv-00957

\*\*\*\*\*

ORAL AND VIDEOTAPED DEPOSITION OF  
JOHN BALDAUFF  
APRIL 17, 2023

\*\*\*\*\*

ORAL AND VIDEOTAPED DEPOSITION of JOHN BALDAUFF,  
produced as a witness at the instance of the  
Defendants, and duly sworn, was taken in the  
above-styled and numbered cause on April 17, 2023,  
from 9:42 a.m. to 4:03 p.m., before Mendy A.  
Schneider, CSR, RPR, in and for the State of Texas,  
recorded by machine shorthand, at the offices of  
Latham & Walker, 811 Main Street, Suite 3700, Houston,  
Texas, pursuant to the Texas Rules of Civil Procedure  
and the provisions stated on the record or attached  
hereto; that the deposition shall be read and signed.

[PAGES INTENTIONALLY OMITTED]

1 Q. Did you start at AMH as an operations --  
2 senior operations engineer?

3 A. Yes, ma'am.

4 Q. And now you're aware that in February 9,  
5 2018, there was a merger involving AMH. True?

6 A. I -- I believe that -- if you say so, the  
7 date, but, yeah, early '19. Yes, ma'am.

8 Q. And as part of that merger, it became a part  
9 of Alta Mesa Resources. Yes?

10 A. I believe so.

11 Q. And you understand that this transaction was  
12 known as the business combination. True?

13 A. Yes, ma'am.

14 Q. And if I say "AMR," you understand that I'm  
15 referring to Alta Mesa Resources and not Alta Mesa  
16 Holdings, right?

17 A. Yes, ma'am.

18 Q. So after the business combination in 2018,  
19 you weren't just a senior operations engineer, were  
20 you?

21 MR. SHER: Objection.

22 A. I believe I was a senior -- still a senior  
23 operations engineer. I'm not -- I mean, I -- I --  
24 titles weren't a very big thing at Alta Mesa. I --  
25 I -- I really don't understand the question.

1 Q. (BY MS. GUZMAN) Well, I guess after the  
2 business combination in 2018, by that time your --  
3 your title was ESP and hydraulic pump expert. True?

4 A. No.

5 Q. No, you were not the ESP hydraulic --

6 A. I --

7 Q. Sir, you were not an ESP and hydraulic pump  
8 expert in 2018 --

9 A. I was --

10 Q. -- as your title?

11 A. That was not my title, but I was an expert.

12 Q. Okay. Tab 10. I'm going to show you what's  
13 been marked as Baldauff Exhibit 1.

14 (Marked Baldauff Exhibit 1.)

15 A. Yes, ma'am.

16 Q. (BY MS. GUZMAN) Okay. And for the record,  
17 this is the document beginning with Bates  
18 No. AMR\_SDTX01096261.

19 Do you see that number at the bottom of  
20 the page?

21 A. Yes, ma'am.

22 Q. This is known as a Bates number. So when I  
23 say "Bates number," it's the -- the number at the  
24 bottom.

25 A. Okay.

[PAGES INTENTIONALLY OMITTED]

1 Paragraph 256 at the top of my Page 84. Oh, I was  
2 looking at --

3 Q. I apologize. For the record, there are two  
4 different numbers.

5 The Page 84 number at the bottom.

6 A. Thank you.

7 Q. Thank you.

8 Starting at the second sentence, it  
9 says: "The allegations contained at Paragraph 266 --  
10 266 are based on information from CW2."

11 Do you see that?

12 A. It says CW -- are you talking about 264?

13 Q. Yes, the second sentence.

14 A. Oh, the second sentence. Yes.

15 Q. And you're CW2, right?

16 A. Yes.

17 Q. If you'll turn to the next page, Page 85.

18 Starting at the second sentence of Paragraph 266, it  
19 says: "A senior reservoir engineer at Alta Mesa  
20 initially provided management with internal EUR  
21 estimates, the estimated recoverable reserves of an  
22 average Company oil well over its lifetime. But,  
23 unhappy with these numbers, Alta Mesa management  
24 pressured the reservoir engineer to provide higher EUR  
25 estimates. After the engineer refused to do so,



1 management removed them from the task of generating  
2 EUR estimates and reduce their job responsibilities."

3 Did I read that correctly?

4 A. You read that correctly.

5 Q. Did you provide this information to  
6 plaintiffs' counsel?

7 A. I don't recall, but that basically is  
8 incorrect.

9 Q. Which parts are incorrect?

10 A. Okay. So if I may elaborate just a little  
11 bit, I do not know if the gentleman was a senior  
12 reservoir engineer. He was a -- he was a reservoir  
13 engineer. I don't know what his title was.

14 And I do not know if Alta Mesa  
15 management pressured the reservoir engineer to provide  
16 higher EUR estimates, but I knew, though, they were  
17 unhappy with his estimates and they ended up using  
18 somebody else's estimates.

19 So that last paragraph -- the last  
20 statement -- or I'm sorry -- the last sentence in that  
21 paragraph, "after the engineer refused to do so," I  
22 don't say he -- they just started using somebody  
23 else's estimates.

24 Q. So let's break this down a little bit.

25 Who is the reservoir engineer that

1     you're referring to?

2           A.     Abbas Belyadi.

3           Q.     Abbas Belyadi?

4           A.     Yes, ma'am.

5           Q.     Can you spell either of those?

6           A.     A-B-B-A-S, Belyadi, B-Y-L-A-I-D-I [verbatim].  
7     I don't know. He's -- he's Persian. He's Iranian, so  
8     I don't...

9           Q.     And you told plaintiffs' counsel that  
10    Mr. Belyadi provided management with internal EUR  
11    estimates and they were unhappy with those numbers.  
12    True?

13          A.     Mr. Belyadi and I were friends. He told me  
14    that a huge part of his job was to provide those  
15    numbers. And the company started getting them from  
16    somebody else that provided larger numbers.

17          Q.     Okay. And you told this to plaintiffs'  
18    counsel?

19          A.     I don't recall, but it's in there. I  
20    remember having this conversation with Mr. Belyadi.

21          Q.     Uh-huh.

22          A.     I do not remember having this conversation  
23    with plaintiffs' counsel. I'll be honest with you, I  
24    don't.

25          Q.     The complaint here says that you provided

1       them with this information, correct?

2                       MR. MAURIELLO:  Objection.

3       A.     Then -- then I possibly did.  I just don't  
4     recall, to be honest.

5       Q.     (BY MS. GUZMAN)  So Mr. --

6                       (Speaking simultaneously.)

7       Q.     (BY MS. GUZMAN)  Sorry.

8       A.     But they didn't get it all correct, because I  
9     didn't say everything in that paragraph.  Okay.

10      Q.     Do you recall when you and Mr. Belyadi had  
11     this conversation?

12      A.     No.  It was before Mr. Belyadi lost his job  
13     and was laid off.

14      Q.     Do you know when that was?

15      A.     No.

16      Q.     After the business combination?

17      A.     Yes -- I -- I -- I don't recall.  I have  
18     to -- I don't recall.

19      Q.     And I think you -- you said this earlier, but  
20     just to be clear, Mr. Belyadi wasn't part of the  
21     production operations group, right?

22      A.     No.

23      Q.     What -- what group was he a part of?  Do you  
24     know?

25      A.     He reported -- he reported to Kevin Bourque.

1 Q. Is that upstream?

2 A. Yes.

3 Q. And who was Mr. Bourque?

4 A. He was vice president of -- I don't -- I  
5 don't remember his exact title. He was the vice  
6 president and he worked in the Oklahoma team. His  
7 office was right next to Mr. Belyadi's.

8 Q. And you didn't tell plaintiffs that  
9 Mr. Belyadi told you that he was pressured to provide  
10 higher EUR estimates. True?

11 MR. SHER: Objection.

12 A. I don't remember my conversation with them.  
13 I -- I -- I remember my conversation with Mr. Belyadi.  
14 I don't remember Mr. Belyadi -- I do not believe  
15 Mr. Belyadi was pressured. He did not give me that.  
16 He just said that they were unhappy with his lower  
17 projections.

18 Q. (BY MS. GUZMAN) Did you tell plaintiffs'  
19 counsel that he was pressured?

20 MR. SHER: Objection.

21 A. I don't recall.

22 Q. (BY MS. GUZMAN) And --

23 A. I -- I -- I think it's a poor choice of  
24 words. I don't -- I don't believe so.

25 Q. Did you tell plaintiffs' counsel that he

1 refused to provide higher EUR numbers?

2 A. I don't recall.

3 Q. Did you tell plaintiffs' counsel that  
4 management removed -- management removed them from the  
5 task of generating EUR estimates and reduced their job  
6 responsibilities?

7 A. I possibly could have said that.

8 Q. Possibly could have told them this, but  
9 you're not sure?

10 A. I don't recall.

11 Q. How many conversations did you have with  
12 Mr. Belyadi about those EUR estimates?

13 A. About that particular issue, just once.

14 Q. And you don't have any notes from that  
15 conversation, right?

16 A. No, ma'am.

17 Q. And you don't have any documents that show  
18 that he told you this?

19 A. No.

20 Q. You didn't think it was important to put in  
21 writing?

22 MR. MAURIELLO: Objection.

23 A. No. I -- I don't -- I wasn't in a position  
24 to take it in writing and I -- there was no reason for  
25 me to do that.

1 Q. (BY MS. GUZMAN) So, no, you didn't think it  
2 was important to put it in writing?

3 A. No.

4 MR. MAURIELLO: Objection.

5 A. I -- at the time, no.

6 Q. (BY MS. GUZMAN) But you did think it was  
7 important enough to tell plaintiffs' counsel even  
8 though you didn't experience this firsthand?

9 MR. MAURIELLO: Objection.

10 MR. SHER: Objection.

11 A. I did not say I didn't experience it  
12 firsthand. I don't -- I don't understand the  
13 question. Could you repeat that, please?

14 Q. (BY MS. GUZMAN) You didn't think this was  
15 important enough to put in writing, but you did think  
16 it was important to tell plaintiffs' counsel?

17 MR. MAURIELLO: Objection.

18 MR. SHER: Objection.

19 A. Yes.

20 Q. (BY MS. GUZMAN) And it wasn't important  
21 enough to write it down at any point prior to this  
22 litigation?

23 MR. MAURIELLO: Objection.

24 MR. SHER: Objection.

25 A. I had no dog in the fight. I wasn't -- no.

1 I was called by plaintiffs' attorneys, and they asked  
2 me and so then I told them.

3 Q. (BY MS. GUZMAN) Did they ask you about  
4 Mr. Belyadi specifically?

5 MR. SHER: Objection.

6 A. I don't recall.

7 Q. (BY MS. GUZMAN) Were they already aware about  
8 a reservoir engineer who provided EUR estimates that  
9 management was unhappy with?

10 MR. MAURIELLO: Objection.

11 MR. SHER: Objection.

12 A. I have no idea.

13 Q. (BY MS. GUZMAN) And do you recall which of  
14 the conversations with plaintiffs you told them about  
15 Mr. Belyadi?

16 A. No, I don't.

17 Q. Did you tell plaintiffs' counsel that  
18 Mr. Belyadi was the reservoir engineer that you were  
19 referring to?

20 A. I don't recall.

21 Q. Do you know whether plaintiffs' counsel ever  
22 contacted Mr. Belyadi to confirm his story?

23 A. I have no idea.

24 MR. SHER: Objection.

25 Q. (BY MS. GUZMAN) Do you know whether they ever

1 asked him to be a witness in this case?

2 MR. SHER: Objection.

3 A. I don't know.

4 Q. (BY MS. GUZMAN) And you don't know when he  
5 provided the EUR estimates to management, correct?

6 MR. MAURIELLO: Objection.

7 A. Could you repeat that again, please?

8 Q. (BY MS. GUZMAN) Do you know when he provided  
9 the EUR estimates to management that they were unhappy  
10 with?

11 MR. MAURIELLO: Objection.

12 A. He provided them on a regular basis. That  
13 was his main job, if I can remember correctly, and he  
14 was very good at that. That was his specialty. And  
15 he performed them, and how often he reported -- you  
16 know, I -- I have no idea how often he reported to  
17 management.

18 Q. (BY MS. GUZMAN) Do you know what his  
19 estimates were that management was unhappy with?

20 MR. MAURIELLO: Objection.

21 A. No. Mr. Belyadi just told me someone else  
22 could do -- was doing it and they were higher, and so  
23 they were using that other person's numbers.

24 Q. (BY MS. GUZMAN) And when we say "management,"  
25 are you -- which individuals are you referring to?



1           A.    I don't know.  He just said -- used the words  
2    "they" in re -- if I can remember correctly, he did  
3    not name any names of management.

4           Q.    To your knowledge, is any of the information  
5    in Paragraph 266 in writing somewhere?

6           A.    No.  I -- let me -- no.

7           Q.    And you weren't personally there when they  
8    told him they were unhappy with his EUR estimates,  
9    right?

10          A.    No, I was not.

11          Q.    So the truth is you have no idea what they  
12   told him, right?

13                   MR. MAURIELLO:  Objection.

14                   MR. SHER:  Objection.

15          A.    Mr. Belyadi told me what I just told you  
16   earlier, that he -- that was his main job and somebody  
17   else was -- that was his main job, and he was worried  
18   about keeping his job because somebody else was now  
19   doing it.  He was still doing it, but they weren't  
20   using his numbers.

21          Q.    (BY MS. GUZMAN) Do you know who the -- the  
22   other person was?

23          A.    I truly don't.  I don't know.

24          Q.    But in short, all of the information in  
25   Paragraph 266 is secondhand information that you got

1 from Mr. Belyadi. True?

2 MR. SHER: Objection.

3 MR. MAURIELLO: Objection.

4 A. I received it from Mr. Belyadi who told me  
5 that happened.

6 Q. (BY MS. GUZMAN) And you haven't seen any  
7 documents to back up the story, right?

8 A. No, I had no reason to.

9 Q. Just to make sure the record is clear, you  
10 have not seen any documents that prove Mr. Belyadi's  
11 story is true, correct?

12 MR. SHER: Objection.

13 A. I talked to Mr. Belyadi myself about the  
14 issue and I believe he was telling me the truth, but I  
15 have not seen any documents.

16 Q. (BY MS. GUZMAN) Okay. And you cannot point  
17 to any single document that proves this ever happened.  
18 True?

19 MR. SHER: Objection.

20 A. I never saw any document.

21 Q. (BY MS. GUZMAN) And the first record from you  
22 that shows this ever happened is the complaint that  
23 was filed in this litigation. True?

24 MR. SHER: Objection.

25 MR. MAURIELLO: Objection.

1           A.     It jogged my memory. I did not remember  
2     telling them that I did -- it jogged my memory about  
3     the conversation that I had with Mr. Belyadi.

4           Q.     (BY MS. GUZMAN) But prior to looking at this  
5     complaint this morning, you've never made a record  
6     that Mr. Belyadi told you this story. True?

7                     MR. SHER: Objection.

8                     MR. MAURIELLO: Objection.

9           A.     There was no reason for me to.

10          Q.     (BY MS. GUZMAN) You never made a record that  
11     Mr. Belyadi told you this story. True?

12                     MR. MAURIELLO: Objection.

13          A.     No. There was no reason for me to.

14          Q.     (BY MS. GUZMAN) Is that a no?

15          A.     That -- that's an, I did not -- I did not  
16     make any record, no.

17          Q.     Thank you.

18                     Going back to the complaint, can you  
19     please turn to Page 37? At the bottom, No. 37.

20          A.     Sure.

21          Q.     Okay. And I am looking at Paragraph 120.  
22     I'm going to start at the second -- second sentence  
23     beginning with "for example."

24                     Do you see that?

25          A.     Yes, ma'am.

[PAGES INTENTIONALLY OMITTED]

1 Q. (BY MS. GUZMAN) But you never wrote down what  
2 your stance was?

3 MR. SHER: Objection.

4 A. I may have. I just -- I just -- I may have.

5 Q. (BY MS. GUZMAN) Okay.

6 A. But I just don't know. I know that was --  
7 there were economical analysis done that -- that may  
8 have stated that, spreadsheets.

9 I don't own -- I don't have anything.  
10 That's why I didn't declare anything. I have no  
11 e-mails. I have no files. Of course, you know, I  
12 stated that almost on a daily basis, and till -- till  
13 they were tired of hearing it, and that was that. It  
14 was just my job to keep them running.

15 Q. But you're saying that it's possible that you  
16 did put in writing that you thought ESPs were not  
17 effective or economical for AMH's wells?

18 A. I -- I've explained to them many times, I  
19 believe in writing. I -- I'm sure there -- it was in  
20 writing somewhere. I -- I don't have a copy of any of  
21 those. That was years ago, okay.

22 I made that abundantly clear many times  
23 in meetings straight to their faces, that this was not  
24 fit for purpose for these wells.

25 Q. Uh-huh.

1                   And we reviewed all of your documents  
2                   from your time at Alta Mesa. We didn't see anything  
3                   that said that.

4                   So is it still your -- is it still your  
5                   testimony today under oath that there is a document  
6                   out there that says that you -- let me finish -- that  
7                   you thought ESPs were not effective or economical?

8                   MR. MAURIELLO: Objection.

9                   MR. SHER: Objection.

10                  A. I don't know. I know there were spreadsheets  
11                  that were -- I don't know what you -- what you with  
12                  recovered, ma'am, or what you discovered. I truly  
13                  don't.

14                         There were -- there were -- there were a  
15                  lot of discussions. There were spreadsheets that we  
16                  ran that were -- and that was just the economics of  
17                  the -- of the -- of the pumps. Everybody there knew  
18                  that I was against that policy. Everybody.

19                  Q. (BY MS. GUZMAN) Did -- sorry.

20                         But is there a document that says --

21                  A. I don't --

22                  Q. -- John Baldauff is against this policy?

23                         MR. SHER: Objection.

24                         MR. MAURIELLO: Objection.

25                  A. I don't know where it would be.

1 Q. (BY MS. GUZMAN) And you said you --

2 MS. GUZMAN: Well, first, I -- to the  
3 extent such documents exist, I just want to reserve  
4 the right to ask those -- that they be produced  
5 because they're covered by the document subpoena in  
6 this case.

7 MR. MAURIELLO: Mr. Baldauff has  
8 indicated that he's made a diligent good faith search  
9 for all responsive documents to the subpoena and  
10 produced through documents which were the only  
11 responsive documents he had.

12 MS. GUZMAN: Understood. He's just  
13 indicating there are documents out there that we  
14 haven't seen, so I just wanted to put it on the  
15 record.

16 MR. SHER: And plaintiffs' lawyer --  
17 you -- you said you reviewed all his e-mails. We  
18 request you produce everything that you reviewed that  
19 we might not have.

20 MS. GUZMAN: Everything I reviewed was  
21 produced.

22 MR. SHER: By defendants?

23 MS. GUZMAN: Everything I reviewed was  
24 produced.

25 MR. SHER: Okay. Thank you.

1 Q. (BY MS. GUZMAN) Okay. So you -- you said you  
2 told -- you told people orally how you felt about ESPs  
3 at Alta Mesa.

4 Who did you tell?

5 A. Everybody on the -- on the engineering team  
6 Jeff Janik, Mike Ellis, Hal Chappelle.

7 Q. What did you tell them exactly?

8 A. I told them what I told you. Because of  
9 those reasons, they were not -- they wanted a list of  
10 25 wells, asked me how many wells that I had  
11 recommended. And I said one and I -- I don't remember  
12 the name of the well.

13 It was a well near a saltwater disposal  
14 well far up north. It was a different type of well.  
15 It had issues and problems that produced extra water  
16 that -- that an ESP would be good in unloading and --  
17 and helping that well.

18 Q. Uh-huh.

19 A. But the other wells were -- were -- was --  
20 they were not fit for purpose and not -- not good  
21 candidates for ESPs. I stand by that now.

22 Q. Uh-huh.

23 A. I've been in -- I've worked ESPs, my first  
24 well in 2000 -- I'm sorry, 1977 was my first ESP that  
25 I ran, and I've been running them ever since.



1 Q. Uh-huh.

2 A. I told them from the very beginning -- they  
3 asked me how many wells were on a list, I said one.  
4 And they said we want 25 by Monday.

5 MS. GUZMAN: Tab 17.

6 Q. (BY MS. GUZMAN) Okay. Mr. Baldauff, I'm  
7 going to show you what has been marked as Baldauff  
8 Exhibit 4.

9 (Marked Baldauff Exhibit 4.)

10 (Discussion off the record.)

11 Q. (BY MS. GUZMAN) And do you recognize this  
12 document?

13 A. Uh-huh. Yes, I do.

14 Q. This is your -- from your LinkedIn page,  
15 correct?

16 A. Yes, it is. Uh-huh.

17 Q. At the bottom of the page you see Alta Mesa  
18 Resources Inc. True?

19 A. Uh-huh.

20 Q. And you see "Artificial Lift, Production  
21 Optimization SME," right?

22 A. Yes.

23 Q. Does SME stand for subject --

24 A. Subject matter expert, yes, ma'am. I'm  
25 sorry.

[PAGES INTENTIONALLY OMITTED]

1 Q. (BY MS. GUZMAN) Just so I understand, there  
2 were other wells that you thought not effective or  
3 noneconomical or was it just that one?

4 MR. SHER: Objection.

5 MR. MAURIELLO: Objection.

6 A. Quite a few wells that were uneconomical.

7 Q. (BY MS. GUZMAN) Okay. And there are --  
8 sitting here today, you cannot identify a specific  
9 document where you told Mr. Chappelle that either  
10 EHU36 or any other well was not effective or  
11 noneconomical?

12 A. I spoke to him -- he came by the -- no, I  
13 didn't have anything in writing, but I spoke to him.  
14 He didn't answer back, he turned his back and walked  
15 away. But he heard me because we were the only ones  
16 in the room and I was two feet away from him. And I  
17 spoke that and he didn't turn around -- or he  
18 didn't -- he pretended I -- he didn't hear, but he  
19 heard.

20 Q. Okay.

21 A. And at that point -- and at that point, he  
22 did that because he knew this day was going to come.  
23 And here I am.

24 Q. And at that point, you -- you didn't follow  
25 up in writing about your position on ESPs at Alta

1 Mesa -- well, on Alta Mesa's wells?

2 MR. SHER: Objection.

3 A. I valued my paycheck. I didn't want to  
4 push the -- that was it. If he didn't want to listen  
5 to me, why would he read something in writing.

6 Q. (BY MS. GUZMAN) So there was a monetary  
7 incentive then to not -- to not speak out about the --  
8 your concern about the ESPs?

9 A. These -- these wells were going to be run  
10 with ESPs whether I helped or not. If I helped, it  
11 could mitigate the losses that we were going to incur,  
12 and I'd keep my job and my paycheck. And I was over  
13 60, okay.

14 And so I was doing the best I could to  
15 help the shareholders out for Alta Mesa by -- by using  
16 my expertise to try to mitigate the -- mitigate the  
17 damages.

18 Q. And you weren't concerned about the fact that  
19 you were doing something that you wholeheartedly  
20 believed was ineffective or economical, as you sit  
21 here today?

22 MR. SHER: Objection.

23 A. I wasn't -- I wasn't doing anything illegal.  
24 I was doing something in my mind to help -- I truly  
25 believed I was helping the company by staying in the

1 game and trying to mitigate the problems that we --  
2 that we were having.

3 As soon as -- as soon as there was a  
4 change in management and Mr. Ellis and Mr. Chappelle  
5 left and there were new people there, we spent our --  
6 our efforts in dismantling the ESPs and pulling them  
7 out when we could -- and put them back on gas lift.  
8 And that, by the way, is noted in one of my -- my  
9 LinkedIn things, okay.

10 By lower -- go ahead, I'm sorry.

11 Q. (BY MS. GUZMAN) Did you have any  
12 communications with Ronald Smith about any of the  
13 allegations in the complaint from you -- attributed to  
14 you?

15 A. None at all.

16 MR. SHER: Objection.

17 Q. (BY MS. GUZMAN) Did you have any  
18 conversations with Mr. Hackett about any of the  
19 allegations in the complaint that are attributed to  
20 you?

21 A. No. Mr. Hackett came to our Monday meetings,  
22 and he didn't ask any questions.

23 Q. So you never specifically told Mr. Hackett  
24 that you thought ESPs were not effective and not  
25 economical?

[PAGES INTENTIONALLY OMITTED]

1 E X A M I N A T I O N

2 BY MR. SHER:

3 Q. Hey, good afternoon, Mr. Baldauff. My name  
4 is Andrew Sher. I represent the plaintiffs in this  
5 class action. I just have a few questions for you  
6 this afternoon.

7 Do you recall testifying a few minutes  
8 ago about being forced to identify wells to install  
9 ESPs in?

10 MS. GUZMAN: Objection to form to the  
11 extent it misstates prior testimony.

12 Q. (BY MR. SHER) Earlier today do you recall  
13 testifying generally about ESPs?

14 A. Yes, I do.

15 Q. And do you recall testimony about being asked  
16 or ordered to identify wells that were candidates for  
17 ESPs shortly after the business combination closed?

18 MS. GUZMAN: Same objection.

19 A. Yes. About a month probably past that date,  
20 yes. Uh-huh. It was on a Friday afternoon.

21 Q. (BY MR. SHER) And who told you that the  
22 company was looking for additional wells that were  
23 candidates for ESPs to be installed in?

24 MS. GUZMAN: Objection. Same objection.

25 A. Jerry Swearingen.

1 Q. (BY MR. SHER) Do you know whose idea it was  
2 to have additional ESPs installed at that time?

3 A. I was told that Hal Chappelle had -- had --  
4 was giving some advice that we get the maximum  
5 production possible and that felt that that was the  
6 best route to do it and we needed to run them.

7 Q. I'm going to -- I -- I believe -- did you  
8 testify -- sorry, strike that.

9 And you testified also before our last  
10 break that you voiced concerns to Mr. Hal Chappelle  
11 regarding the installation of ESPs, that it was not  
12 optimal?

13 MS. GUZMAN: Objection to the extent it  
14 misstates the witness's prior testimony.

15 Q. (BY MR. SHER) Sorry.

16 Do you recall testifying earlier that  
17 you raised concerns to Mr. Hal Chappelle on regarding  
18 whether -- or that it was not optimal to install  
19 additional ESPs?

20 MS. GUZMAN: Same objection, and also  
21 vague.

22 A. I -- I stated that a specific well, EHU,  
23 which he liked to talk about and say, hey, it did well  
24 there, hopefully we can get some more like that. And  
25 my point to him was, Hal, that was the exception and